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7 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

8 UNITED STATES OF AMERICA,

9 Plaintiff,

10 vs.

11 ADALI ARNULFO ESCALANTE-  
TRUJILLO,

13 Defendant.

Case No. 2:20-cr-00156-RFB-DJA

Government's Motion for Leave to  
Dismiss Indictment Without Prejudice  
Pursuant to Federal Rule of Criminal  
Procedure 48(a)

15 The United States of America requests leave of Court pursuant to Rule 48(a) of the  
16 Federal Rules of Criminal Procedure to dismiss without prejudice the Criminal Indictment  
17 filed on July 8, 2020, ECF Doc. 1, as to defendant Adali Arnulfo Escalante-Trujillo.

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The government has recently learned about events that cast doubt on the credibility of a government witness who is integral to prosecution of this defendant. In the interests of justice, the United States of America seeks to dismiss the pending indictment as to this defendant.

The defendant is detained pending trial.

Respectfully submitted March 28, 2024.

JASON M. FRIERSON  
United States Attorney

/s/ Jacob H. Operskalski  
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2                   **UNITED STATES DISTRICT COURT**  
3                   **DISTRICT OF NEVADA**

4                   UNITED STATES OF AMERICA,

5                   Plaintiff,

6                   vs.

7                   ADALI ARNULFO ESCALANTE-  
TRUJILLO,

8                   Defendant.

9                   Case No. 2:20-cr-00156-RFB-DJA

10                  [PROPOSED] ORDER of Dismissal

11                  This matter coming before the Court on the Government's Motion for Leave to  
12 Dismiss the Indictment as to Adali Arnulfo Escalante-Trujillo without prejudice pursuant  
13 to Federal Rule of Criminal Procedure 48(a), the Court having considered the premises  
14 therein and good cause showing, the Motion is GRANTED.

15                  It is therefore ORDERED that the Indictment is dismissed as to Adali Arnulfo  
16 Escalante-Trujillo without prejudice. The Defendant is ordered released immediately.

17                  DATED this 29th day of March, 2024.



18                  HONORABLE RICHARD E. BOULWARE, II  
19                  UNITED STATES DISTRICT JUDGE